

M. Rapps Associates

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Notification Sent
Permit E. P. A. Act §39 (c)

ENVIRONMENTAL ENGINEERING

DL/NPC

July 22, 1983

RECEIVED

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Illinois Environmental Protection Agency
Division of Land Pollution Control
Permit Section
2200 Churchill Road
Springfield, Illinois 62706

E.P.A. - D.L.P.C.
STATE OF ILLINOIS

ATTN: Larry Eastep

Re: Macoupin Co. LPC
Brighton L.F. (No's 1 & 2)

Dear Mr. Eastep:

Brighton Landfill has been in operation since 1971. In the ensuing interval the Agency has awarded the site an operating permit for the original parcel, an operating permit for a site extension, and more recently, a development permit for a site modification that effects both parcels. Each permit carries its own set of groundwater monitoring requirements which, having been formulated independent of one another, tend to overlap. Further, complicating this situation is the fact that Brighton Landfill, being a "hazardous waste" site, is also subject to a completely different set of RCRA monitoring requirements. In addition, the site has, from time to time, found it necessary to repair, replace, or otherwise remove from service, several of its designated monitoring points.

Circumstances just mentioned are such that Brighton Landfill's current monitoring requirements, taken as a whole, are an incredible muddle. In review of this matter a number of overlapping, redundant or obsolete requirements will stand out very clearly. The program now in place is, in our opinion, insufficient in some areas but excessive in others. It is now required, for example, that one well be monitored and another be installed and monitored in the center of what will someday be a very deep trench. The present program does not require stream sampling even though the on-site stream is a discharge point for, and ultimate recipient of, shallow groundwater

EPA Region 5 Records Ctr.



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passing from beneath the site. These and other problems are detailed in the attached Sampling and Analysis Plan.

The attached plan is intended to fulfill a RCRA regulatory requirement. But it is also designed to support the following request for a supplemental permit. Namely:

We are hereby requesting that a supplemental permit be issued that will 1.) adopt a consolidated monitoring program as described in the Sampling and Analysis Plan as the Brighton Landfill monitoring program and that 2.) the plan replace and override all previously established requirements contained in Brighton Landfill's various permits.

I think that you will find the plan to very comprehensive and reasonably straight forward considering the circumstances. However, should questions arise, please do not hesitate to call me.

Thank you.

Sincerely,


Michael W. Rapps, P.E.

MWR/jh

cc: Brighton Landfill
Environmental Analysis, Inc.
Fred Prillaman